- $\overline{\underline{}}$ de maximis, inc.

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January 15, 2020

VIA ELECTRONIC MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

Re: Monthly Progress Report No. 152 – December 2019
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
(RI/FS)
CERCLA Docket No. 02-2007-2009

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On December 6, EPA Region 2 (Region 2) and CPG held a teleconference to discuss compositing of Current Conditions Biota tissue samples.
- On December 20, Region 2 and CPG held a teleconference to discuss response to Region 2 comments on Draft Upper 9-Mile Interim Remedy Feasibility Study (IR FS).

Correspondence

 On December 2, Region 2 and CPG exchanged emails regarding the sampling schedule for the Current Conditions sampling field work. Ms. D. Salkie LPRSA RI/FS - Progress Report No. 152 – December 2019 January 15, 2020 Page 2 of 4

- On December 3, Region 2 and CPG exchanged emails regarding the status of feedback from the Contaminated Sediment Technical Advisory Group (CSTAG)/National Remedy Review Board (NRRB) meeting conducted on November 19-21
- On December 3, Region 2 provided comments to CPG on the revised Current Conditions Biota tissue compositing schemes.
- On December 3, CPG requested an update on the potential schedule for receiving detailed comments on the Draft Upper 9-Mile IR FS Adaptive Management Plan (AMP) and Completion Appendices from Region 2.
- On December 5, CPG requested a teleconference with Region 2's FS team to discuss Draft IR FS comments.
- On December 5, CPG requested a teleconference with Region 2 to discuss compositing schemes for the Current Conditions Biota tissue samples.
- On December 5, Region 2 provided CPG an update on the anticipated dates for providing detailed comments on the Draft Upper 9-Mile IR FS AMP and Completion Appendices.
- On December 6, Region 2 and CPG exchanged emails regarding scheduling a teleconference to discuss Draft Upper 9-Mile IR FS comments.
- On December 9, Region 2 provided their presentation to the CSTAG/NRRB to CPG.
- On December 10, Region 2 requested specific tissue sample composites for Current Conditions Biota sample splits from CPG.
- On December 10, CPG indicated to Region 2 that the Current Conditions Biota tissue sample compositing schemes proposed by Region 2 were acceptable.
- On December 10, CPG requested confirmation of the sample types for Current Conditions Biota tissue composite splits requested by Region 2.
- On December 11, Region 2 confirmed the Current Conditions Biota tissue sample types requested and provided a correction to the sample ID table provided on December 10.
- On December 11, CPG provided responses to Region 2 for August 12, 2019 comments on the Draft Upper 9-Mile IR FS.
- On December 11, CPG provided Region 2 a spreadsheet summarizing the final compositing schemes for the Current Conditions Biota tissue samples.
- On December 13, CPG requested Region 2 copy the CPG Project Coordinators when sending emails to CPG consultants.
- On December 16, CPG provided Region 2 a status update on the December 11 13 lab oversight visit observing Current Conditions Biota tissue sample homogenization.
- On December 16, Region 2 proposed a new definition for source sediments for the Draft Upper 9-Mile IR FS to CPG.
- On December 16, CPG consultants provided Region 2 consultants a memo outlining proposed numeric model projection metrics for the revised Draft Upper 9-Mile IR FS.
- On December 16, CPG delivered the November Monthly Progress Report to Region 2
- On December 17, CPG provided Region 2 clarifications and responses to the New Jersey Department of Environmental Protection CSTAG/NRRB Stakeholder letter dated November 14, 2019 and November 20 Stakeholder presentation.
- On December 19, CPG provided Region 2 an agenda for the scheduled December 20, 2019 teleconference to discuss Region 2 comments on the Draft Upper 9-Mile IR FS.

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- On December 19, CPG provided Region 2 a spreadsheet showing a proposed revised Current Conditions white perch tissue composite scheme.
- On December 19, Region 2 indicated to CPG that the revised proposed Current Conditions white perch tissue compositing scheme was acceptable.
- On December 20, Region 2 consultants provided CPG high-level slides/comments on the Draft Upper 9-Mile IR FS AMP for the teleconference.
- On December 20, CPG provided proposed changes to Region 2's December 16 source sediment definition discussed during the December 20 teleconference.

Work

- CPG continued work on supplemental modeling projections for the Draft Upper 9-Mile IR FS.
- CPG continued reviewed and response to Region 2 comments on the Draft Upper 9-Mile IR FS.
- CPG continued field work for the Physical Water Column Monitoring (PWCM) component of Current Conditions Sampling.
- CPG continued field work for the Small Volume Chemical Water Column Monitoring (SV CWCM) component of Current Conditions Sampling.
- CPG continued analysis of PWCM and SV CWCM samples.
- CPG continued validation of PWCM and SV CWCM data.
- CPG continued developing the QAPP for the Current Conditions High Volume (HV) CWCM program.
- CPG continued work on revision and calibration of the Bioaccumulation Model.
- CPG continued to work with Region 2 to develop a Current Conditions Biota tissue sample compositing plan.
- CPG initiated compositing Current Conditions Biota tissue for analysis.

(b) Results of Sampling and Tests

 On December 16, CPG uploaded an Electronic Data Deliverable (EDD) for validated data from the Current Conditions PWCM program, sampling rounds 1 (July 2019) and 2 (September 2019) to the EPA SharePoint site.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue calibration of the Bioaccumulation Model.
- CPG will respond to comments on the Draft Upper 9-Mile IR FS.
- CPG will continue developing the HV CWCM QAPP.
- CPG will continue analysis and validation of PWCM and SV CWCM samples and data.
- CPG will continue supplemental modeling projections for the Draft Upper 9-Mile IR FS.

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- CPG will continue compositing the Current Conditions Biota tissue samples and begin processing and analysis of the composites.
- (d) <u>Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.</u>
 - CPG needs to receive comments on the Draft IR FS Appendices D and H (Adaptive Management and IR Completion) and CSTAG/NRRB Recommendations as soon as possible in order to complete the IR FS in a timely manner.

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.

Willard Potter

CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel

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